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4 *Plaintiff Zoya Kovalenko*

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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 OAKLAND DIVISION

11 ZOYA KOVALENKO, et al.,

12 *Plaintiffs,*

13 v.

14 KIRKLAND & ELLIS LLP, MICHAEL  
DE VRIES, MICHAEL W. DEVRIES,  
15 P.C., ADAM ALPER, ADAM R. ALPER,  
P.C., AKSHAY DEORAS, AKSHAY S.  
16 DEORAS, P.C., AND MARK FAHEY,

17 *Defendants.*

Case No. 4:22-cv-05990-HSG

**PLAINTIFF'S OBJECTION TO  
ATTORNEY APPLICATION FOR  
ADMISSION *PRO HAC VICE***

Re: Dkt. No. 195

**PLAINTIFF’S OBJECTION TO ATTORNEY APPLICATION**  
**FOR ADMISSION *PRO HAC VICE***

Plaintiff respectfully submits this objection to Parisis G. Filippatos’s Application for Admission *Pro Hac Vice*, Dkt. No. 195. Hours before a hearing involving assertions of professional misconduct by Filippatos PLLC, Mr. Filippatos filed a last-minute application for admission *pro hac vice*. Parisis G. Filippatos’s Application for Admission *Pro Hac Vice*, Dkt. No. 195 (“*Pro Hac Vice* Application”); *see* Order, Dkt. No. 194 (setting hearing for today at 2 pm on motions, Dkt. Nos. 171 & 177). The Court should reject the *Pro Hac Vice* Application or at minimum abstain from granting the application given the pending dispute before the Court directly pertaining to Plaintiff’s assertions of extreme professional misconduct by Filippatos PLLC, including Mr. Filippatos. In order to be admitted *pro hac vice*, Mr. Filippatos must “abide by, the Local Rules of this Court, especially the Standards of Professional Conduct for attorneys.” *Pro Hac Vice* Application at 2. Because of the pending dispute and evidence Plaintiff has proffered in recent filings supporting a finding that Filippatos PLLC has breached its ethical and professional obligations to Plaintiff, there is sufficient basis to cast serious doubt on Mr. Filippatos’s willingness and ability to abide by professional rules of this Court. *See generally* Pl.’s Mot. (Jan. 29, 2025), Dkt. No. 171; Kovalenko Decl. ISO Pl.’s Opp’n Filippatos’s Cross-Mot. Attach. A, Dkt. No. 181-2 (Dkt. No. 186-5) (Jan. 2025 emails between Plaintiff and Filippatos PLLC); Kovalenko Decl. ISO Pl.’s Opp’n Filippatos’s Cross-Mot. Attach. A, Dkt. No. 181-5 (Dkt. No. 186-8) (Dec. 2024 emails between Plaintiff and Filippatos PLLC); Kovalenko Decl. ISO Mot. Notice For-Cause Termination of Filippatos PLLC, Dkt. No. 171-1 (Dkt. No. 176-4).

Additionally, Mr. Filippatos has had ample opportunity to file a *pro hac vice* application at an earlier point in time, including in over the past month since Plaintiff filed her motion to notice termination of Filippatos PLLC for cause. Pl.’s Mot. (Jan. 29, 2025), Dkt. No. 171. Accordingly, the Court should not grant this last-minute request before the hearing and prior to the Court issuing a ruling on whether Filippatos PLLC has engaged in professional misconduct.

